

MICHAEL A. CARDOZO  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT

100 CHURCH STREET  
NEW YORK, NY 10007

AMY N. OKEREKE  
Assistant Corporation Counsel  
(212) 788-9790  
(212) 788-9776 (fax)  
aokereke@law.nyc.gov

# MEMO ENDORSED

November 13, 2007

**BY HAND**

Honorable P. Kevin Castel  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, New York 10007

Re: Tyrone Perry v. City of New York, et al.  
07 Civ. 7347 (PKC)

Your Honor:

*Appropriate  
Granted  
SO ORDERED  
[Signature]  
USDS  
11-14-07*

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to the defense of the above referenced matter, in which the Court previously granted defendants an extension until November 9, 2007 to respond to the complaint.<sup>1</sup> I write to respectfully request a brief three week enlargement of time, until November 30, 2007, to answer or otherwise respond to the plaintiff's complaint on behalf of defendant Police Officer Prince Williams. Plaintiff's counsel consents to this request.

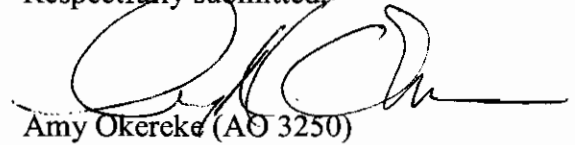
Defendant Williams is currently on indefinite medical leave from the New York City Police Department. Despite our best efforts, this office has been unable to speak with defendant Williams regarding the instant matter. An additional three week enlargement of time is necessary so that this office can attempt to establish contact with defendant Williams, and make the requisite representational decisions. Pursuant to Section 50-K of the New York General Municipal Law, the Corporation Counsel's office must determine based on a review of the facts of the case, whether we may represent Officer Williams. If the Corporation Counsel's office determines that it can represent defendant Williams in this matter, it must then obtain his written authorization. Due to Officer Williams' medical leave, this office has been unable to conduct an interview with him to complete the mandatory representational investigation. As a result, an enlargement of time will afford this office an opportunity to complete its investigation, and defendant Williams' defenses will not be jeopardized while representational issues are being decided.

<sup>1</sup> Today, defendant City of New York filed their answer, a courtesy copy of which is enclosed.

Accordingly, I respectfully request that defendant Williams' time to answer or otherwise respond to the complaint be enlarged to and including November 30, 2007.

Thank you for your time and consideration of this request

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Amy Okereke', is written over the typed name.

Amy Okereke (AO 3250)  
Assistant Corporation Counsel  
Special Federal Litigation Division

enc.

cc: Darius Wadia, Esq., (by first class mail)